

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Paul Hastings LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period from
May 1, 2024 through May 31, 2024

| | |
|------------------------------------|--------------------------|
| Total Fees: | <u>\$6,404.00</u> |
| Total Disbursements: | <u>\$199.90</u> |
| Less 20% holdback of Fees: | <u>\$1,280.80</u> |
| Amount Sought at this Time: | <u>\$5,322.20</u> |

| Name | Department or Group | Date of First Admission | Hourly Rate | Total for Statement Period | |
|------------------|-------------------------|-------------------------|-------------|----------------------------|------------|
| | | | | Hours Billed | Amount |
| Matthew Micheli | Financial Restructuring | 2002 | \$1,885.00 | 1.00 | \$1,885.00 |
| Ryan Montefusco | Financial Restructuring | 2012 | \$1,850.00 | 0.10 | \$185.00 |
| Total Counsel: | | | | 1.10 | \$2,070.00 |
| Louise Simpson | Financial Restructuring | 2022 | \$985.00 | 4.40 | \$4,334.00 |
| Total Associate: | | | | 4.40 | \$4,334.00 |
| Total: | | | | 5.50 | \$6,404.00 |

**SECTION II
SUMMARY OF SERVICES**

| | Total for Statement Period | |
|--|----------------------------|------------|
| U.S. Trustee Task Code and Project Category | Total Hours | Total Fees |
| B160 Employment / Fee Applications (Paul Hastings) | 5.40 | \$6,219.00 |
| B191 General Litigation | 0.10 | \$185.00 |
| TOTAL: | 5.50 | \$6,404.00 |

SECTION III
SUMMARY OF DISBURSEMENTS

| Category | Total for Statement Period |
|-------------------------------|----------------------------|
| Outside Professional Services | \$199.90 |
| TOTAL: | \$199.90 |

I certify under the penalty of perjury that the above is true.

Dated: August 13, 2024

/s/ Mathew M. Murphy
Mathew M. Murphy

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Kristopher M. Hansen (admitted *pro hac vice*)

PAUL HASTINGS LLP
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Matthew M. Murphy (admitted *pro hac vice*)

COLE SCHOTZ P.C.
Court Plaza North
25 Main Street, P.O. Box 800
Hackensack, New Jersey 07602-0800
Michael D. Sirota
Warren A. Usatine
Seth Van Aalten (admitted *pro hac vice*)
Justin Alberto (admitted *pro hac vice*)

PARKINS & RUBIO LLP
700 Milam, Suite 1300
Houston, Texas 77002
Lenard M. Parkins (admitted *pro hac vice*)
Charles M. Rubio (admitted *pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,
COUNSEL TO AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE
PERIOD FROM MAY 1, 2024 THROUGH MAY 31, 2024**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

On June 20, 2023, the Court entered the Order Authorizing the Debtor to Enter into the Reimbursement Agreement [ECF No. 838] (the “Reimbursement Order”), pursuant to which the Debtor entered into a post-petition expense reimbursement agreement (the “Reimbursement Agreement”) to pay certain fees and expenses of the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”).

The Reimbursement Agreement provides that the Debtor will pay the reasonable and documented fees and out-of-pocket expenses of professionals retained by the AHC of Supporting Counsel, including, among others, Paul Hastings LLP (“Paul Hastings”), for the period from April 18, 2023 through the termination of the Reimbursement Agreement.

The Reimbursement Agreement further provides that Paul Hastings will file monthly fee statements and interim and final fee applications in accordance with the Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [ECF No. 562] (the “Interim Compensation Order”), entered on May 22, 2023.

The Court’s *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [ECF No. 1211] (the “Dismissal Order”) provides that the “fees and expenses of professionals retained by the Ad Hoc Committee of Supporting Counsel shall remain subject to the” Reimbursement Agreement. The Dismissal Order further provides that the Interim Compensation Order “shall remain in full force and effect through and including the Appeal Exhaustion Date” for Retained Professionals, which covers professionals retained by the Ad Hoc Committee of Supporting Counsel.

Paul Hastings respectfully submits this Fee Application in accordance with the Reimbursement Order, the Reimbursement Agreement, the Interim Compensation Order, and the

Dismissal Order for services rendered and expenses incurred as counsel to the Ad Hoc Committee of Supporting Counsel for the period commencing May 1, 2024 and ending May 31, 2024 (the “Statement Period”).

The billing invoice, including a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Paul Hastings for the Statement Period, is annexed hereto as Exhibit A. This invoice details the services performed by Paul Hastings during the Statement Period.

The payment of fees and reimbursement of expenses requested in this Statement are as follows:

| Fees (100%) | Fee Holdback (20%) | Fee Payment (80%) | Expense Reimbursement (100%) |
|------------------------|-------------------------------|------------------------------|---|
| \$6,404.00 | \$1,280.80 | \$5,123.20 | \$199.90 |

WHEREFORE, Paul Hastings respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$5,323.10 (80% of total fees and 100% of expenses) in accordance with the Interim Compensation Order.

Dated: August 13, 2024

PAUL HASTINGS LLP

/s/ Matthew M. Murphy

Matthew M. Murphy (*admitted pro hac vice*)
71 South Wacker Drive, Suite 4500
Chicago, IL 60606
Telephone: (312) 499-6000
Email: mattmurphy@paulhastings.com

Kristopher M. Hansen (*admitted pro hac vice*)
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Email: krishansen@paulhastings.com

Counsel to AHC of Supporting Counsel

EXHIBIT A



PAUL HASTINGS LLP
200 Park Avenue, New York, NY 10166-3205
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Ad Hoc Committee of Supporting Talc Counsel in LTL August 6, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2407247

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

| | |
|--|-------------------|
| Legal fees for professional services for the period ending May 31, 2024 | \$6,404.00 |
| Costs incurred and advanced | 199.90 |
| Current Fees and Costs Due | \$6,603.90 |
| Total Balance Due - Due Upon Receipt | \$6,603.90 |

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ terigoffredo@paulhastings.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:
Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:
Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA
90189-4803

Pay by Tranch:
You can now pay your invoices online via
real-time bank payments, credit cards or
in installments:
<https://paywithtranch.com/paulhastings>

*For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com. This is a no-reply mailbox
Please refer all questions to billing@paulhastings.com*



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Ad Hoc Committee of Supporting Talc Counsel in LTL August 6, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2407247

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

| | |
|--|-------------------|
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Wiring and ACH Instructions:
Citibank
ABA # 322271724
SWIFT Address: CITIUS33
787 W. 5th Street
Los Angeles, CA 90071
Account Number: 206628380
Account Name: Paul Hastings LLP

Remittance Address:
Paul Hastings LLP
Lockbox 4803
PO Box 894803
Los Angeles, CA
90189-4803

Pay by Tranch:
You can now pay your invoices online via real-time bank payments, credit cards or in installments:
<https://paywithtranch.com/paulhastings>

For wires, please reference the invoice, client and matter number(s) being paid
For ACH payments, please use the CTX format and/or send any remittances to cashepn@paulhastings.com. This is a no-reply mailbox
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Invoice Number: 2407247

Attn: Jonathan Schulman

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FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2024

Representation in Chapter 11 bankruptcy proceedings **\$6,404.00**

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|---|-----------------|---|--------------|-------------|---------------|
| B160 Fee/Employment Applications | | | | | |
| 05/01/2024 | LS27 | Correspond with M. Micheli and B. Churbuck re filing CNOs for November through January fee statements | 0.30 | 985.00 | 295.50 |
| 05/06/2024 | LS27 | Review CNOS for November through January fee statements (.9); correspond with M. Micheli re same (.1) | 1.00 | 985.00 | 985.00 |
| 05/09/2024 | LS27 | Correspond with M. Micheli re February and March fee statements | 0.30 | 985.00 | 295.50 |
| 05/09/2024 | MM53 | Review and revise monthly invoices | 0.30 | 1,885.00 | 565.50 |
| 05/10/2024 | LS27 | Correspond with B. Churbuck re filed CNOs | 0.10 | 985.00 | 98.50 |
| 05/20/2024 | LS27 | Correspond with M. Micheli re approved fee statements | 0.20 | 985.00 | 197.00 |
| 05/20/2024 | MM53 | Review and revise February invoice (.4); review and revise March invoice (.3) | 0.70 | 1,885.00 | 1,319.50 |
| 05/21/2024 | LS27 | Correspond with Cole Schotz and M. Micheli re fee application | 0.20 | 985.00 | 197.00 |

Ad Hoc Committee of Supporting Talc Counsel in LTL
51691-00002
Invoice No. 2407247

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| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|---|-----------------|---|--------------|-------------|-----------------|
| 05/28/2024 | LS27 | Review, analyze issues, documentation re invoices, fee statements (.9); correspond with M. Micheli, C. Edge and M. Jones re same (.1) | 1.00 | 985.00 | 985.00 |
| 05/29/2024 | LS27 | Review and revise January and February invoices (.6); correspond with M. Micheli, M. Jones and C. Edge re same (.1) | 0.70 | 985.00 | 689.50 |
| 05/30/2024 | LS27 | Teleconference with Cole Schotz re interim fee application and next steps (.4); analyze issues re same (.2) | 0.60 | 985.00 | 591.00 |
| Subtotal: B160 Fee/Employment Applications | | | 5.40 | | 6,219.00 |

B191 General Litigation

| | | | | | |
|--|------|--|-------------|----------|---------------|
| 05/24/2024 | RM30 | Correspond with M. Murphy and M. Micheli re appellate disclosure statement | 0.10 | 1,850.00 | 185.00 |
| Subtotal: B191 General Litigation | | | 0.10 | | 185.00 |

| | | | | | |
|--------------|--|--|-------------|--|-----------------|
| Total | | | 5.50 | | 6,404.00 |
|--------------|--|--|-------------|--|-----------------|

Timekeeper Summary

| <u>ID</u> | <u>Timekeeper Name</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Fee</u> |
|-----------|------------------------|--------------|--------------|-------------|------------|
| MM53 | Matthew Micheli | Of Counsel | 1.00 | 1,885.00 | 1,885.00 |
| RM30 | Ryan Montefusco | Of Counsel | 0.10 | 1,850.00 | 185.00 |
| LS27 | Louise Simpson | Associate | 4.40 | 985.00 | 4,334.00 |

Costs incurred and advanced

| <u>Date</u> | <u>Description</u> | <u>Quantity</u> | <u>Rate</u> | <u>Amount</u> |
|--|--|-----------------|-------------|-----------------|
| 04/30/2024 | UnitedLex Invoices - Unitedlex Corp, Invoice# 097571 Dated 04/30/24, UnitedLex – DSAI April 2024 Charges – Outside Professional Services | | | 199.90 |
| Total Costs incurred and advanced | | | | \$199.90 |

Ad Hoc Committee of Supporting Talc Counsel in LTL
51691-00002
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| | |
|---|---------------------------------|
| Current Fees and Costs | \$6,603.90 |
| Total Balance Due - Due Upon Receipt | <u><u>\$6,603.90</u></u> |